

JAP:HDM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

JOSE REYES,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

Keith LaGesse, being duly sworn, deposes and states that he is a Special Agent with the United States Department of State, Diplomatic Security Service, duly appointed according to law and acting as such.

On or about June 30, 2010, within the Eastern District of New York and elsewhere, the defendant JOSE REYES did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

(Title 18, United States Code, Section 1542)

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COMPLAINT AND
AFFIDAVIT IN
SUPPORT OF
APPLICATION FOR
ARREST WARRANT

(T. 18 U.S.C. § 1542)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the United States Department of State, Diplomatic Security Service ("DSS"), and have been involved in the investigation of numerous cases involving passport fraud for over two years. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about June 30, 2010, the defendant applied for a United States Passport at a United State Post Office in Hollis, Queens, New York. On the application, form DS-11, the defendant provided a false name as his own, submitted an incorrect date of birth, as well as a false social security number. Specifically, the defendant stated that his name was Pedro Nunez, that he was born on January 20, 1965, and had a social security number ending in 670. The defendant presented a valid New York State driver's license in the name of Pedro R. Nunez and two passport-sized photographs in support of his application.

3. The passport photographs that the defendant provided with his passport application were uploaded into the Travel Document Issuing System ("TDIS"). A facial recognition match with said photographs indicated a passport had previously been applied for by the defendant under the same name, Pedro Nunez.

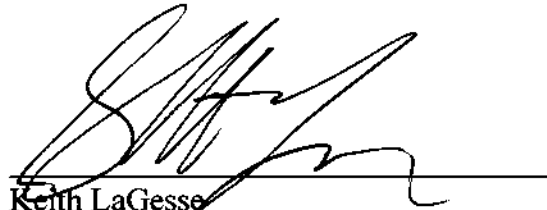
4. Thereafter, DSS was contacted. I and other DSS agents conducted database searches, including criminal history checks, using the identifying information

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

provided on the defendant's passport application. The check revealed numerous records under the name Pedro Nunez with the same pedigree information provided by the defendant in support of his June 30, 2010 passport application. However, the photographs of Pedro Nunez did not match the photographs provided by the defendant in support of his June 30, 2010 passport application.

5. Based on a review of DSS investigative files and criminal record checks, I and other DSS agents determined that the defendant's actual name was JOSE REYES, and had different pedigree information than Pedro Nunez, including a different date of birth and FBI number.

WHEREFORE, your deponent respectfully requests that the defendant be dealt with according to law.


Keith LaGesse
Special Agent
United States Department of State, Diplomatic
Security Service

Sworn to before me this
20th day of May, 2015


S/Ramon Reyes, Jr.


THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK